

Timothy M. Stubson, Wyo. Bar No. 6-3144  
Brandon E. Pryde, Wyo. Bar No. 8-6883  
Holly L. Tysse, Wyo. Bar No. 7-5553  
Crowley Fleck PLLP  
111 West 2<sup>nd</sup> Street, Suite 220  
Casper, WY 82601  
(P) 307-232-6901  
[tstubson@crowleyfleck.com](mailto:tstubson@crowleyfleck.com)  
[bpryde@crowleyfleck.com](mailto:bpryde@crowleyfleck.com)  
[htysse@crowleyfleck.com](mailto:htysse@crowleyfleck.com)

Eugene M. LaFlamme (Admitted pro hac vice)  
Jared B. Giroux (Admitted pro hac vice)  
Jillian L. Lukens (Admitted pro hac vice)  
McCoy Leavitt Laskey, LLC  
N19 W24200 Riverwood Drive, Suite 125  
Waukesha, WI 53188  
(P) 262-522-7000  
[elaflamme@MLLlaw.com](mailto:elaflamme@MLLlaw.com)  
[jgiroux@MLLlaw.com](mailto:jgiroux@MLLlaw.com)  
[jlukens@MLLlaw.com](mailto:jlukens@MLLlaw.com)

*Attorneys for Defendants,  
Walmart Inc. and Jetson Electric Bikes, LLC*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING**

STEPHANIE WADSWORTH  
Individually and as Parent and Legal Guardian  
of W.W., K.W., G.W., and L.W., minor children  
and MATTHEW WADSWORTH,  
  
Plaintiffs,  
  
v.  
  
WALMART INC. and  
JETSON ELECTRIC BIKES, LLC,  
  
Defendants.

Case No. 2:23-cv-00118-NDF

**DEFENDANTS JETSON  
ELECTRIC BIKES, LLC AND  
WALMART INC.'S MOTIONS  
IN LIMINE; MEMORANDUM  
IN SUPPORT OF MOTIONS;  
DECLARATION IN SUPPORT**

WALMART INC. (“Walmart”) and JETSON ELECTRIC BIKES, LLC (“Jetson”), (collectively “Defendants”), by and through their attorneys, Crowley Fleck PLLP and McCoy Leavitt Laskey LLC, hereby submit their Motions *in Limine* 1 through 5.

This Motion is made pursuant to Federal Rules of Evidence, the Court’s Amended Scheduling Order (Doc. 78), the Court’s inherent powers, and is based upon the exhibits, declaration, Memorandum in Support of Motion, the pleadings on file in this matter and on any further evidence or matters that may be presented to the Court.

The Motion will be heard by the Honorable Scott P. Klosterman at the United States District Court for the District of Wyoming, 2120 Capitol Avenue Cheyenne, WY 82001, and on a date and time to be set by the Court.

In accordance with this Court’s Local Rule 7.1(b)(1)(a), the undersigned certifies that legal counsel for Defendants has in good faith conferred with legal counsel for Plaintiffs on these motions.

**McCOY LEAVITT LASKEY LLC**

Attorneys for Defendants, Jetson Electric Bikes,  
LLC and Walmart Inc.

Dated: January 22, 2025

By: 

Eugene M. LaFlamme (*pro hac vice*)  
Jared B. Giroux (*pro hac vice*)  
Jillian L. Lukens (*pro hac vice*)  
McCoy Leavitt Laskey, LLC  
N19 W24200 Riverwood Drive, Suite 125  
Waukesha, WI 53188  
(P) 262-522-7000  
[elaflamme@MLLlaw.com](mailto:elaflamme@MLLlaw.com)  
[jgiroux@MLLlaw.com](mailto:jgiroux@MLLlaw.com)  
[jlukens@MLLlaw.com](mailto:jlukens@MLLlaw.com)

and

Timothy M. Stubson, Wyo. Bar No. 6-3144

Brandon E. Pryde, Wyo. Bar No. 8-6883

Holly L. Tysse, Wyo. Bar No. 7-5553

Crowley Fleck, PLLP

111 West 2<sup>nd</sup> Street, Suite 220

Casper, WY 82601

(P) 307-232-6901

[tstubson@crowleyfleck.com](mailto:tstubson@crowleyfleck.com)

[bpryde@crowleyfleck.com](mailto:bpryde@crowleyfleck.com)

[htysse@crowleyfleck.com](mailto:htysse@crowleyfleck.com)